## THE ANACONDA COMPANY

P.O. BOX 1932. BUTTE, MONTANA 59701

ENVIRONMENTAL ENGINEERING DEPARTMENT OFFICE OF THE DIRECTOR LW. WARREN

RE:

January 8, 1969

Mr. Claiborne W. Brinck, Director Division of Environmental Sanitation State Board of Health Helena, Montana 59601

Attention: Mr. Don G. Willems

Dear Sir:

I have before me a copy of your letter of January 7, 1969 addressed to Mr. Hook, Manager of Environmental Control at the Anaconda Aluminum Company Plant in Columbia Falls.

To say the least, I am quite surprised, in fact, shocked, at paragraph number four wherein you state that "the present means of sewage treatment is inadequate and planning should be started for secondary treatment". I would ask, on what basis do you make this judgement? My data indicate that the existing facility provides secondary treatment.

Paragraph four is also most disturbing in view of my recent discussions with Don and yourself wherein it was agreed that either disinfection or ponding of the Sewage Treatment Plant effluent would satisfy your requirements. Again, I would ask, do you have bacteriological evidence that we are violating the water quality criteria of 1,000 coliforms/100 ml of Flathead River water? However, we shall characterize the coliform level in our effluent as time permits.

Frankly, I agree that the pond would provide little if any treatment (depending upon the definition of treatment), but had stated to Mr. Hook and others that a final pond would provide an additional safety factor in the event of uncontrollable losses from the process or Sewage Treatment Plant upsets. I would expect some conversion of form of treated waste constituents, however, even with the short retention time.

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In short, Clay and Don, I do take issue with your conclusion that the Sewage Treatment Plant is inadequate and contend that it does provide secondary treatment and an effluent that doesn't violate the B-D1 classification of the Flathead River after adequate mixing time (or distance).

I would also like to know the source of the titanium report in order that we may learn the method of analysis employed. We have been unable to locate a suitable method for determining minute quantities of titanium. The atomic absorption method is reported as entirely unsatisfactory. We are continuing on this however.

We have conducted heavy metals analyses on recently collected Flathead River samples. All levels, including aluminum, were extremely low with aluminum concentrations being lower than the minimum detectable amount (0.02 ppm) as determined by the aluminon technique outlined in Standard Methods. My recent survey of the plant left me doubting even the possibility of any significant metal losses via water carried wastes. We shall however, conduct the analyses of heavy metals in our effluent as requested by your paragraph two as soon as possible.

Sincerely,

John C. Spindler

JCS/1b

cc: Mr. John W. Warren